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Attorneys for Applicant
ILYAS KHRAPUNOV

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE APPLICATION OF ILYAS
KHRAPUNOV PURSUANT TO 28 U.S.C. §
1782 FOR THE TAKING OF DISCOVERY
FOR USE IN A FOREIGN PROCEEDING,

Applicant.

Case No. 4:17-mc-80107-HSG (KAW)

**STIPULATION AND ORDER SETTING
BRIEFING SCHEDULE**

Judge: Hon. Haywood S. Gilliam, Jr.
Date: March 1, 2018
Time: 2:00 p.m.

Applicant Ilyas Khrapunov, by his counsel Martha Boersch, and non-Parties Pavel Prosyankin and John Doe (collectively “Objectors”), by their counsel Jeffrey L. Bornstein, hereby stipulate and agree as follows:

1. On October 1, 2017, Objectors Pavel Prosyankin and John Doe filed a motion to quash the subpoena Magistrate Judge Kandis A. Westmore issued on August 25, 2017, to Google, Inc. (Dkt. 8). Ilyas Khrapunov applied for that subpoena pursuant to 28 U.S.C. § 1782.

2. After briefing and oral argument on the motion to quash, Judge Westmore issued an order on November 22, 2017, granting in part and denying in part the Objectors’ motion to quash. In the order, she granted the Objectors 15 days in which to file a motion in this Court for relief from her

1 order. (Dkt. 29).

2 3. On December 6, 2017, the Objectors filed a Motion for De Novo Determination of
3 Dispositive Order of Magistrate Judge concurrently with an Administrative Motion to Augment
4 Record and Set Briefing Schedule. (Dkts. 32 and 33). The Objectors have noticed March 1, 2018, as
5 the hearing date for their motions.

6 4. The parties have conferred and have agreed to the following briefing schedule:

- 7 • Applicant Khrapunov's responses shall be filed on or before January 24, 2018.
- 8 • Any replies by the Objectors shall be filed on or before February 14, 2018.

9 5. This stipulated briefing schedule is sought due to the press of other matters. The
10 proposed briefing schedule does not alter the noticed hearing date.

11 6. The proposed briefing schedule also does not alter the Stay issued by the Magistrate
12 Judge in her November 22, 2017, order, which Objectors have argued should remain in effect for 10
13 days following a dispositive ruling by this Court on Objectors' Motion for De Novo Determination.

14 IT IS SO STIPULATED.

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16 Dated: December 13, 2017

BOERSCH SHAPIRO LLP

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18 /s/ Martha Boersch

Martha Boersch
Attorney for Applicant
Ilyas Khrapunov

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21 Dated: December 13, 2017


ROSEN BIEN GALVAN & GRUNFELD LLP

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23 /s/ Jeffrey L. Bornstein

Jeffrey L. Bornstein
Attorney for Objectors
Pavel Prosyankin and John Doe

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IT IS SO ORDERED.


HON. HAYWOOD S. GILLIAM, JR.
United States District Judge